

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: Maria M. Panas

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Case No. 19-13914-KHK
Chapter 13

Debtor.

DEBTOR'S APPLICATION TO EMPLOY REAL ESTATE AGENT

Maria M. Panas ("Debtor") in the above-captioned case, by counsel, hereby applies pursuant to 11 U.S.C. § 327 and Bankruptcy Rule 2014 for entry of an Order employing eXp Realty, LLC and Jesse W. Soto, MBA ("Proposed Agent") as the real estate agent for the purpose of marketing and selling certain real property more particularly described below, and in support thereof states as follows:

1. Specific Facts Showing Necessity for Employment: On November 29, 2019, Debtor filed the above-captioned case under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division. Debtor is the co-owner of residential real property located at 1001 Galium Court, McLean, VA 22102 (the "Property").
2. Reason for Selection of Proposed Counsel: Proposed Agent is experienced in the marketing and selling of residential real property in Northern Virginia.
3. Professional Services to be Rendered: The procurement and submission of offers to purchase the Property for maximum benefit to the bankruptcy estate.

4. Proposed Arrangement for Compensation: If the Property is contracted to be sold, Proposed Agent shall have earned a commission of 5%, subject to Court approval and conditional and payable upon the closing of the sale.
5. Disinterested Persons: Proposed Counsel believes and therefore represents that he is a disinterested person within the meaning of 11 U.S.C. § 327, as set forth in the Verified Statement attached as Exhibit A.
6. Connections of Proposed Counsel with the Debtor, creditors, other parties in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee:
 - (a) with the Debtor: None;
 - (b) with creditors: None;
 - (c) with other parties in interest: None.
 - (d) with their respective attorneys and accountants: None; and
 - (e) with the U.S. trustee or any person employed in the office of the U.S. trustee: None.
7. Method for Objection. Pursuant to Local Bankruptcy Rule 2014-1, any objections to the proposed employment shall be made in writing, filed with the Court, with a copy served on the movant, the United States Trustee, and all secured creditors within 14 days from the date of service of this Motion.

WHEREFORE, the Debtor, Maria M. Panas, respectfully requests this Court enter an Order authorizing the appointment of Jesse W. Soto, MBA of eXp Realty, LLC as the Debtor's real estate agent, and grant such other and further relief as it deems just and appropriate.

AP LAW GROUP, PLC

/s/ Maria M. Panas
By Counsel

/s/ Ashvin Pandurangi
Ashvin Pandurangi, Esq., VSB# 86966
AP Law Group, PLC
211 Park Ave.
Falls Church, VA 22046
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Fax: (571) 699-0518
ap@aplawg.com
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of December, 2019 a true copy of the foregoing Application to Employ Real Estate Agent was sent via ECF and email to the United States Trustee for Region 4, and by first class mail, postage prepaid to the attached list of creditors.

/s/ Ashvin Pandurangi
Ashvin Pandurangi, Esq., VSB# 8696

Eagle Bank
610 Executive Blvd.
8th Floor
Rockville, MD 20852

Select Portfolio Servicing
Attn: Bankruptcy
Po Box 65250
Salt Lake City, UT 84165

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VERIFIED STATEMENT

Proposed Agent, Jesse W. Soto, MBA, has the following connections with the Debtor, creditors, other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee:

1. with the Debtor: None;
2. with creditors: None.
3. with other parties in interest: None.
4. with their respective attorneys and accountants: None; and
5. with the U.S. Trustee or any person employed in the office of the
U.S. Trustee: None.

Proposed Agent, Jesse W. Soto, MBA, does not represent or hold any interest adverse to the debtor or to the estate.

COMMONWEALTH OF VIRGINIA
CITY OF FALLS CHURCH, to wit:

I, Jesse W. Soto, having been duly sworn according to law, do hereby state that I have read the foregoing statement of my connections with the Debtor, creditors, other parties in interest, their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, that I do not represent or hold any interest adverse to the debtor or to the estate and that the same is true and complete to the best of my knowledge and belief.

eXp Realty, LLC
Jesse W. Soto, MBA


By: Jesse W. Soto

I, the undersigned, a Notary Public in and for the jurisdiction aforesaid, do hereby certify that Jesse W. Soto, whose name is signed to the writing above, bearing date on the 11th day of December, 2019 has acknowledged the same before me in my aforesaid jurisdiction.

Given under my hand and seal this 11th day of December, 2019


NOTARY PUBLIC

My Commission expires: 2/29/2020.

